

Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington, D.C. 20554



Petition for Emergency Relief Due to COVID-Related Delays in Sunset Transition for Central Station Alarm Subscribers  
GN Docket No. 21-304

February 14, 2021

Dear Commissioners,

On behalf of AASA, The School Superintendents Association (AASA) and the National Association for Pupil Transportation (NAPT), I write in response to Petition for Emergency Relief Due to COVID-Related Delays in Sunset Transition for Central Station Alarm Subscribers GN Docket No. 21-304.

AASA is the national professional organization representing public school superintendents; NAPT is the leading trade association for the student transportation industry, a vibrant and diverse community of people and organizations that share a passion for safe and efficient student transportation. AASA and NAPT believe transportation is integral to education, an invaluable component of a successful educational enterprise. This filing is in follow up to earlier comments filed by NAPT (September 2021).

Next week AT&T seeks to end all customers use of their 3G networks. Specific to school transportation, this means that any commercial transport (like school buses) reliant on 3G technology will go dark, losing the ability to track/manage their logistics if their devices have not been upgraded. School districts nationwide rely on a mix of legacy 3G hardware, in combination with 4G units, to safely and seamlessly run their transportation operations. On an average day, nearly 500,000 yellow school buses are providing transportation to and from schools for approximately 25 million elementary and secondary school students; these buses also transport another 3 to 5 million children every school day on activity and field trips. In normal times, AT&T's deadline may have worked. 2020-2021, however, was anything but normal.

The nation's public schools and the students they serve and transport daily continue to endure a pandemic that has upended their previous daily educational experience. As NAPT wrote in September, a confluence of events have negatively impacted the ability of school districts to fully update their transportation fleets, meaning their ability to track and manage their fleets (And maintain the safety of their students) will go dark in February of 2022. AASA and NAPT have been monitoring this issue both in coordination with and on behalf of their members. While this is not the top priority our members bring to our attention, the scope of the potential impact is robust enough that we continue to engage, and must be mindful of what could happen should these services go dark. According to data from Zonar Systems, upwards of five to ten percent of all public school buses across the country will lose GPS and communications service next week if AT&T moves forward with this shutdown. In terms of impact, schools districts across the country could lose all ability to centrally operate and guide their school buses overnight. Schools could also lose the contact-tracing solutions to help them comply with COVID mitigation and quarantine protocols to help reduce the likelihood of significant COVID outbreaks in the schools.

NAPT had previously asked the commission to delay AT&T's discontinuation of 3G service for six months, a switch that would allow the industry time to source components and to continue to build and install 4G telematics devices at a pace commensurate with the currently depressed global supply chain. Given this delay appears unlikely to happen, we file this letter to document our continued concern, and our commitment to work with the FCC to ensure the continued safety of the 25 million students our members transport each day.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in black ink that reads "Noelle Ellerson Ng". The signature is written in a cursive, flowing style.

Noelle Ellerson Ng

Associate Executive Director, AASA, The School Superintendents Association  
Legislative Liaison, National Association for Pupil Transportation